

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Robert Holt, et al. v. National Football
League, et al.

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS MYRON
AND KATHLEEN TALIAFERRO**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed, P.L.L.P. ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Myron Taliaferro and Kathleen Taliaferro only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Myron Taliaferro and Kathleen Taliaferro.

2. Plaintiffs' counsel filed a short form complaint for Myron Taliaferro and Kathleen Taliaferro on August 20, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Myron Taliaferro and Kathleen Taliaferro and the undersigned.

4. Plaintiffs' counsel properly notified Myron Taliaferro and Kathleen Taliaferro of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Myron Taliaferro and Kathleen Taliaferro only in Court File No. 2:12-cv-4185-AB.

Dated: June 10, 2015

Respectfully submitted,

ZIMMERMAN REED, P.L.L.P.

s/ Brian C. Gudmundson

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